```
1
    Patrick R. Leverty, Esq.
    Nevada State Bar No. 8840
    LEVERTY & ASSOCIATES LAW CHTD.
    832 Willow Street
 3
    Reno, Nevada 89502
    Ph: (775) 322-6636
    Fax: (775) 322-3953
 4
    email: pat@levertylaw.com
    Attorneys for Kalicki Collier Defendants
 5
 6
                            UNITED STATES DISTRICT COURT
 7
                                  DISTRICT OF NEVADA
 8
    ALPS PROPERTY & CASUALTY
    INSURANCE COMPANY
 9
                 Plaintiff,
10
                                                 Case No.:
                                                              3:19-cv-00709-MMD-CLB
           V.
11
                                                 STIPULATION FOR EXTENSION OF
                                                 TIME FOR DEFENDANT COLLIER TO
    KALICKI COLLIER, LLP; JOHN A.
    COLLIER: JAMES A KALICKI: and ROBIN
                                                 FILE A REPLY TO HIS MOTION TO
12
    RUMBAUGH, as Trustee of the Edith and
                                                 AMEND THE SCHEDULING ORDER
13
    James Harley Trust Dated August 31, 1981,
                                                 AND FOR LEAVE TO FILE A
    Trustee of the Edith and James Harley Trust -
                                                 COUNTER-COMPLAINT
    Survivor's Trust, and Trustee of the Edith and
14
    James Harley Trust - Residual Trust.
15
                                                 (FIRST REQUEST)
                       Defendants.
16
17
          Plaintiff ALPS Property & Casualty Insurance Company ("ALPS") and Defendant John
18
    A. Collier ("Collier"), by and through their respective counsel, respectively stipulate that
19
    Defendant Collier shall have up to and including Friday, August 14, 2020, to file a reply to his
20
    Motion to Amend the Scheduling Order and for Leave to File a Counter-Complaint.
21
          On July 20, 2020, Defendant Collier filed a Motion to Amend the Scheduling Order and
    for Leave to File a Counter-Complaint. (ECF #80). On August 3, 2020, Plaintiff ALPS filed an
22
23
    opposition. (ECF #82). Defendant Collier's reply is currently due on Monday, August 10, 2020.
          On August 5, 2020, Defendant Collier requested an additional four (4) business days to
24
25
    file the reply and ALPS graciously granted the request.
26
    ////
27
    ////
28
    ////
                                             1
```

This is the first (1st) requested extension related to the Motion to Amend the Scheduling 1 2 Order and for Leave to File a Counter-Complaint. (ECF #80). DATED this 6th day of August, 2020. 3 DATED this 6th day of August, 2020. 4 KUTAK ROCK LLP LEVERTY & ASSOCIATES LAW CHTD. 5 /S/ Brooke McCarthy /S/ Patrick Leverty Kevin D. Hartzell (pro hac vice) Patrick R. Leverty 6 Brooke H. McCarthy (pro hac vice) 832 Willow Street 1650 Farnam Street 7 Reno, NV 89502 Omaha, NE 68102-2186 Attorneys for the KC Defendants 8 Douglas R. Brown, Esq. 9 Lemons, Grundy & Eisenberg 6005 Plumas Street, Third Floor 10 Reno, Nevada 89519 Attorneys for Plaintiff ALPS Property & 11 Casualty Insurance Company 12 IT IS 80 ORDERED: 13 14 UNITED STATES MAGISTRATE JUDGE 15 August 7, 2020 DATED: 16 17 18 19 20 21 22 23 24 25 26 27 28

	Case 3:19-cv-00709-MMD-CLB Document 8୪ Filed 08/0୪/20 Page 3 of 3
1	
1	<u>CERTIFICATE OF SERVICE</u>
2	I, HEREBY CERTIFY that, on August 6, 2020, I electronically filed the foregoing with the
3	Clerk of Court using the CM/E CF system, which will send a Notice of Electronic Filing to all
4	counsel of record.
5	/S/ Patrick Leverty
6	Patrick R. Leverty
7	
8	
9	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	3